

Wendy M. Krincek, Esq.
Nevada Bar No. 6417
Diana G. Dickinson
Nevada Bar 13477
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, Nevada 89169.5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
wkrincek@littler.com
ddickinson@littler.com

Attorneys for Defendant
ENCOMPASS HEALTH REHABILITATION
HOSPITAL OF LAS VEGAS, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PAUL SULLIVAN,

Plaintiff

v.

ENCOMPASS HEALTH REHABILITATION
HOSPITAL OF LAS VEGAS, LLC., a Delaware
Limited Liability Company; DOES I-X; ROE
BUSINESS ENTITIES I-X,

Defendant

Case No. 2:24-cv-02328-CDS-MDC

**Order Approving STIPULATION TO
EXTEND DEADLINE FOR
DEFENDANT TO FILE REPLY IN
SUPPORT OF MOTION FOR
PARTIAL DISMISSAL**

(FIRST REQUEST)

[ECF No. 13]

Plaintiff PAUL SULLIVAN (“Plaintiff”) and Defendant ENCOMPASS HEALTH REHABILITATION HOSPITAL OF LAS VEGAS, LLC (“Defendant”) by and through their respective counsel of record, hereby agree and stipulate to extend the time for Defendant to file a Reply in Support of its Partial Motion to Dismiss Plaintiff’s First Amended Complaint from the current deadline of January 31, 2025¹, up to and including **February 7, 2025**.

The requested extension is necessary due to the workload of counsel, including the Early Neutral Evaluation for this matter on January 29, 2025 (ECF No. 6), and because counsel for Defendant has a preplanned international vacation.

///

¹ Defendant filed its Partial Motion to Dismiss Plaintiff’s First Amended Complaint on January 10, 2025. ECF No. 10. Plaintiff’s Opposition is due January 24, 2025, and thus Defendant’s Reply will be due one week later. See Local Rule 7-2(b).

1 This is the first request for an extension of time to file the Reply. This request is made in good
2 faith and not for the purpose of delay.

3
4 Dated: January 23, 2025

Dated: January 23, 2025

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ James P. Kemp

James P., Kemp, Esq.
KEMP & KEMP, ATTORNEYS AT LAW

8
9 *Attorneys for Plaintiff*
PAUL SULLIVAN

/s/ Diana G. Dickinson

Wendy M. Krincek, Esq.
Diana G. Dickinson, Esq.
LITTLER MENDELSON, P.C.

10 *Attorneys for Defendant*
ENCOMPASS HEALTH REHABILITATION
HOSPITAL OF LAS VEGAS, LLC

11
12 **ORDER**

13 Based on the parties' stipulation, the deadline for defendant to file a reply in support of its
14 motion for partial dismissal (ECF No. 10) is extended up to and including February 7, 2025.

15
16 
17 UNITED STATES DISTRICT JUDGE

18 DATED: January 23, 2025
19
20
21
22
23
24
25
26
27
28